

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,

Plaintiff,

v.

LYKART TECHNOLOGIES LLC, et al.,

Defendants.

Case No. 1:22-cv-1754 (JFS)(PJC)
Hon. Joseph F. Saporito, Jr., presiding
Hon. Philip J. Caraballo, referral

**UNOPPOSED MOTION OF DEFENDANT MOZILLA CORPORATION TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Mozilla Corporation ("Mozilla"), by and through its undersigned counsel, hereby moves for an extension of time to respond to Plaintiff's Operative Complaint, and in support thereof, avers as follows:

1. Mozilla was served with the Complaint on February 24, 2025.
2. Mozilla's response to the Verified Third Complaint is currently due on or before Monday March 17, 2025.
3. Undersigned counsel was just retained. Defendant needs additional time to investigate Plaintiff's allegations and gather information to properly respond to Plaintiff's Third Verified Complaint.
4. Further, Plaintiff Catanzaro has now filed motions seeking leave to file a Fourth Amended Complaint (ECF Nos. 49-51) and a Fifth Amended Complaint (ECF No. 53).
5. On March 12, 2025, Plaintiff Catanzaro wrote to counsel for Mozilla and explained, "I just agreed to give Google, youtube and Alphabet a new 30 day extension to answer the fifth amended complaint *after the judge rules on it*. Within the next few days I will be asking the judge to dismiss the motion for leave to file the fourth amended complaint and proposed complaint. I

will agree to the same terms for Mozilla.” (emphasis in the original).

6. Plaintiff does not oppose the requested extension.

7. Because Plaintiff concurs in this request and the reasons for the request are set forth in the body of this motion, no supporting brief is required pursuant to Middle District Local Rule 7.5.

8. No party will be prejudiced by this Court granting an extension, and this motion is not being filed for purposes of harassment or delay.

9. This is Defendant’s first request to extend this deadline.

WHEREFORE, Defendant Mozilla Corporation respectfully requests an extension of time of thirty (30) days after this Court determines the Operative Complaint.

Respectfully submitted,

/s/ Jennifer Berger
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*Counsel for Defendant Mozilla
Corporation*

Dated: March 13, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she caused a copy of the foregoing to be served upon the following via email and first-class mail on this 13th day of March, 2025:

David J. Catanzaro
286 Upper Powderly Street
Carbondale, PA 18407
davidjosephus@aol.com

/s/ Jennifer Berger
Jennifer Berger